General-Ability of Oregon's Agriculture Programs to Meet CZARA Management Measure Requirements

- Existing comment (slight modification)
- Need to pull out language that speaks more to meeting WQS/designated uses that CZARA MMs.
- Source: Programs-General (and maybe some other categories)
- Agriculture-Extent of Nonpoint Source Pollution form Agriculture
 - Existing comment, expand to include pro/con (now just on how we didn't prove our case, add comments that speak to problems due to ag runoff)
 - Sources: Programs General, Extent of Pollution from Ag, Env-Gen, Env-Water Use
- General-Effectiveness of Oregon's Agriculture Programs for Achieving Water Quality
 Standards and Protecting Designated Uses
 - o Pull some language from above existing comment
 - Source: Programs-Genera, Env-Water Use, Env-General (and maybe some other categories?)
- General-Effectiveness of Agriculture Water Quality Management Area Program for Meeting
 CZARA Management Measures (Focus on programs and processes/implementation)
 - Existing comment but revise to just focus on implementation aspects. Leave enforcement discussion for new summary comment.
 - Sources: Effectiveness of AWQMP, Adequacy of AWQMP
- General-Need for Oregon's Agriculture Programs to Have Greater Focus on Prevention Rather than Addressing Water Quality Impairments After They Occur
 - New comment
 - Sources: Restoration vs Protection, 55-f
- General-Effectiveness of ODA's Enforcement of Agriculture Programs
 - New comment (pull out relevant lang from existing AWQMP summary comment)
 - Sources: Adequacy of AWQMP, Effectiveness of AWQMP, Enforcement
- General—Inadequacy of Oregon Water Resources Department's (OWRD) Water Use Basin Program for Meeting Irrigation Management Measure
 - o Existing comment. Just make sure 65-G incorporated.
- Agriculture-Buffers
 - Existing comment
 - Sources: Ag Buffers
- Agriculture-Pesticides
 - Existing Comment
 - Sources: Ag related Pesticides
- Pesticides-General
 - New comment—create new summary comment to capture general comments related to pesticides/toxics that don't relate specifically to ag or forestry.
 - o May need to break into a couple of sub categories based on themes in comments?
 - Sources: Ag Pesticides; Fish Toxcity (maybe others)
- Agriculture-CAFOs

- o New comment
- o Sources: Env-CAFO and a few CAFO related comments at beginning of Programs-General

• Agriculture-Grazing

- o New comment
- Sources: Some buffers (specific to grazing?), and Management measures, voluntary
 MMs

Agriculture-Need for Additional Management Measures

- Existing comment
- Sources: Management measures (and other categories)

Agriculture-Addressing Legacy Issues

- o Existing comment
- Sources: Ag-Legacy Issues

Agriculture-Effectiveness of Existing Monitoring and Tracking Programs

- Existing comment
- Sources: Monitoring and Tracking

• Agriculture-Economic Achievability of Management Measures

- o New comment
- o Sources: Economic Achievability